

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

PABLO VELAZQUEZ RIVERA

DEBTOR(S)

CASE NO. 10-08895 BKT

CHAPTER 13

**DEBTOR'S ANSWER TO BANCO POPULAR'S OBJECTION
OF CHAPTER 13 PLAN DATED SEPTEMBER 26th, 2010**

TO THE HONORABLE COURT:

Comes now Debtor, represented by the undersigned attorney, and represents as follows:

- 1) On November 5, 2010 Banco Popular de Puerto Rico filed an Objection to confirmation of chapter 13 plan dated September 26th, 2010 alleging Debtor's proposed plan did not provide for the payment of the pre-petition lease arrears owed to Banco Popular.
- 2) An amended Chapter 13 plan will be filed to include adequate protection by Debtor's voluntary surrender of the motor vehicle under lease.

WHEREFORE the undersigned attorney for Debtor requests from this Honorable Court to take notice of the above stated and declare the objection moot upon the filing of the amended plan.

RESPECTFULLY SUBMITTED.

CERTIFICATE OF SERVICE: I hereby certify that on this same date I electronically filed the above document with the Clerk of the Court using the CM/ECF System which will send a notification of such filing to all C/MECF participants in this case, including: Chapter 13 Trustee, and to Monsita Lecaroz Arribas, Esq., Assistant U.S. Trustee. I hereby certify that I mailed this document by First Class Mail postage prepaid to the non CM/ECF participants included in the attached master address list.

Debtor's answer to Banco Popular's
Objection to chapter 13 plan
Case No. 10-08895 BKT
Page 2

In San Juan, Puerto Rico, January 31, 2011.

s/JOSE L. JIMENEZ QUINONES

José L. Jiménez Quiñones, Esq.

USDCPR 203808

268 AVE. PONCE DE LEON

Suite 1118

San Juan, P.R. 00918-2007

TEL: 787-282-9009

FAX: 1 (866) 326-9416 & 787-282-2009

jimenezlawoffice@gmail.com

jljimenez11@gmail.com